

David Ward  
**KLUGER HEALEY, LLC**  
219 Broad Street  
Red Bank, NJ 07701  
P: (732) 852-7500  
F: (888) 635-1653

Brian G. Bodine (Pro Hac Vice)  
Gretchen J. Hoog (Pro Hac Vice)  
**LANE POWELL, PC**  
1420 Fifth Avenue, Suite 4200  
Seattle, WA 98101  
Telephone: (206) 223-7000

Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

STRIKEFORCE TECHNOLOGIES, INC.,

Plaintiff,

vs.

AUTHENTIFY PATENT CO., LLC, and  
AUTHENTIFY, INC.,

Defendants.

Civil Action No. 13-03242 (JEI) (AMD)

**NOTICE OF MOTION TO  
STAY PROCEEDINGS**

**MOTION RETURNABLE  
November 18, 2013**

**PLEASE TAKE NOTICE**, that on November 18, 2013, defendants Authentify Patent Co., LLC and Authentify, Inc., shall move before the Hon. Joseph E. Irenas, United States District Judge, United States District Court, District of New Jersey, for an Order staying the motions to dismiss filed in this matter and further proceedings herein pending the resolution of StrikeForce Technologies Inc.,'s Motion to Dismiss currently before the Honorable Ricardo Martinez of the District Court for the Western District of Washington.

In support of this motion, defendants shall rely upon the Brief submitted herewith.

A proposed form of Order is also submitted herewith.

DATED: October 17, 2013

KLUGER HEALEY, LLC

/s/David A. Ward

By: David Ward

Brian G. Bodine, Esq. (*Pro Hac Vice*)  
Gretchen J. Hoog, Esq. (*Pro Hac Vice*)  
LANE POWELL, PC  
*Attorneys for Authentify Patent Co., LLC  
and Authentify, Inc.*